

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

KAREN BALDRIDGE,)	
)	
Plaintiff,)	Case No. <u>CIV-22-558-PRW</u>
)	
v.)	
)	Removed from District Court
OLD NAVY, LLC and)	of Oklahoma County
THE GAP, INC.,)	Case No. CJ-2022-168
)	
Defendants.)	

NOTICE OF REMOVAL

Defendants, Old Navy, LLC and The Gap, Inc., hereby notify the Court and the Plaintiff that it is removing this action to the United States District Court of the Western District of Oklahoma pursuant to 28 U.S.C. §§ 1331, *et seq.* Defendants respectfully show the Court as follows:

1. Defendants have been sued in a civil action in the District Court of Oklahoma County, State of Oklahoma, styled *Karen Baldridge v. Old Navy, LLC and The Gap, Inc.*, Case No. CJ-2022-168 (“State Court Action”). The State Court Action was filed on January 11, 2022.

2. Plaintiff’s Petition asserts state law claims of negligence with damages in excess of \$75,000.

3. On information and belief Plaintiff is an individual domiciled in the state of Oklahoma.

4. Defendant Old Navy, LLC is a foreign corporation incorporated under the laws of the state of Delaware with its principal place of business in California.

5. Defendant The Gap, Inc. is a foreign corporation incorporated under the laws of the state of Delaware with its principal place of business in California.

6. Defendants were served with process on June 27, 2022. Therefore, this Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b)(3) because Defendants filed this Notice within thirty (30) days of their receipt of the Petition and Summons.

7. This removal is pursuant to 28 U.S.C. § 1332 because Plaintiff has alleged state law claims with damages in excess of \$75,000 and there is complete diversity amongst the parties.

8. Written notice of the filing of this Notice of Removal will promptly be given to Plaintiff and a copy of the Notice of Removal will be filed with the Clerk of the District Court of Oklahoma County, State of Oklahoma, as provided by 28 U.S.C. § 1446(d).

9. Copies of all process, pleadings, and orders filed or served upon Defendants in the aforementioned State Court Action are attached hereto as follows, and made a part hereof:

Exhibit 1	Docket Sheet
Exhibit 2	Summons
Exhibit 3	Petition
Exhibit 4	Service of Process Notification

10. Defendants respectfully reserve the right to file all appropriate motions and raise all defenses and objections in this action after they have been properly removed to the United States District Court for the Western District of Oklahoma.

WHEREFORE, Defendants by and through counsel, hereby remove the above-captioned case now pending in the District Court of Oklahoma County, State of Oklahoma, to the United States District Court for the Western District of Oklahoma, invoking this Court's jurisdiction.

JURY TRIAL DEMANDED.

Respectfully submitted,

s/ Hailey M. Hopper
Hailey M. Hopper, OBA No. 31093
PIERCE COUCH HENDRICKSON
BAYSINGER & GREEN, LLP
Post Office Box 26350
Oklahoma City, OK 73126
Telephone: (405) 235-1611
Facsimile: (405) 235-2904
hhopper@piercecouch.com
Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of July, 2022, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrant:

L. Justin Lowe
3133 N.W. 63rd Street
Oklahoma City, OK 73116
justin@justinlowepc.com
Attorney for Plaintiff

s/ Hailey M. Hopper
Hailey M. Hopper